

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: :
Mark P. Kerry AKA Mark Kerry, AKA : Case No.: 17-14927
Mark Patrick Kerry : Chapter 13
: Judge Richard E. Fehling
: *****
Debtor(s) :
HSBC Bank USA, National Association : Date and Time of Hearing
as Trustee for Citigroup Mortgage Loan : September 14, 2017 at 9:30 a.m.
Trust Inc., Asset Backed Pass-Through :
Certificates Series 2004-RP1 : Place of Hearing
Creditor : 400 Washington Street
vs : Courtroom #1
: Reading, PA, 19601
Mark P. Kerry AKA Mark Kerry, AKA :
Mark Patrick Kerry : Related Document # 13
Frederick L. Reigle
Respondents.

**STIPULATION FOR SETTLEMENT OF MOTION FOR CONTINUATION OF
AUTOMATIC STAY PURSUANT TO 11 U.S.C. §362(C)(3)(B) (DOCKET # 13)**

This matter coming to be heard on the Motion for Continuation of Automatic Stay Pursuant To 11 U.S.C. §362(C)(3)(B) (Dkt. #13) which was filed in this court by Mark P. Kerry AKA Mark Kerry, AKA Mark Patrick Kerry ("Debtor"), and the opposition thereto of HSBC Bank USA, National Association as Trustee for Citigroup Mortgage Loan Trust Inc., Asset Backed Pass-Through Certificates Series 2004-RP1 ("Creditor"). Creditor and Debtor, by and through their attorneys stipulate to the following:

IT IS HEREBY ORDERED:

1. The Automatic Stay is extended as to Creditor's lien on the property located at 334 Carbon Street, Easton, Pennsylvania, 18045.
2. Debtor will make timely post-petition mortgage payments directly to Creditor.
3. Should Debtor fail to make two (2) post-petition monthly mortgage payments, Creditor shall send a notice of default to Debtor and counsel for Debtor. Debtor shall have fourteen (14) calendar days from the date notice is mailed to cure the default and bring the loan post-petition current. Should Debtor fail to cure the default as specified above, the automatic stay shall terminate as to Creditor, its principals, agents, successors and/or assigns as to the subject property, upon filing certification of default with a proposed order.
4. In the event of dismissal of this case within the first 365 days of the petition date, the Debtor shall be prohibited from refile a bankruptcy petition, under any chapter of the

- Code, for a period of 180 days and the automatic stay shall not apply to the Property for a period of two years from the date of entry of the dismissal Order.
5. Upon recordation of an Order granting relief from the automatic stay in the official records of the Northampton County Recorder of Deeds, the Order shall be binding in any other case filed under this title purporting to affect the Property as supported by the Mortgage recorded as Instrument number 1998021250 on June 5, 1998 and described as follows:

Legal Description: ALL THAT CERTAIN place or parcel or tract of land situate in the Township of Palmer, County of Northampton and Commonwealth of Pennsylvania and being known as Lot No. 11 on the Plan entitled Woodridge Falls Section 1-A dated 1/21/92 and last revised 4-23-92 prepared by Mic Zeworski & Sons at Palmer I, Inc. by Michail J Robel & Associates, Consulting Engineers as recorded in the Office of teh Recorder of Deeds in and for Northampton County at Easton, PA on 5-13-92 in Plan Book 92 on Page 124. County Parcel #M9NW4-15-23.

Tax ID: 24M9NW4 15 23

Property Address: 334 Carbon Street, Easton, PA 18045

Any sheriff that is presented with a bankruptcy petition filed within the two year period referenced in paragraph 4 above, by Debtor Mark Kerry or any other person claiming an interest in the Property, may disregard the petition and continue to obtain possession of the Property.

MANLEY DEAS KOCHALSKI LLC

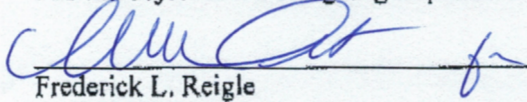
Dated: 11/8/17

BY: K. Velter
Karina Velter (94781)
Manley Deas Kochalski LLC
P.O. Box 165028
Columbus, OH 43216-5028
614-220-5611; Fax 614-627-8181
Email: kvelter@manleydeas.com
Attorney for Creditor

Dated: 10/27/2017

BY: William Hronis
William Hronis
609 Hamilton Street
Allentown, PA 18101
Telephone: 610-740-1004
Fax: 610-740-9357
Email: william.hronis@gmail.com
Attorney for Debtor

I do not object to the foregoing Stipulation



Frederick L. Reigle

Chapter 13 Trustee

2901 St. Lawrence Ave.

Reading, PA 19606

Email: ecfmail@fredreiglech13.com

11/9/17